June 6, 2001

Richard Sprott, Director Division of Air Quality Department of Environmental Quality P.O. Box 144820 Salt Lake City, UT 84114-4820

Attention: Milka Radulovic

Dear Director Sprott,

IPSC NOTICE OF INTENT: Corrections

On April 4, 2001, Intermountain Power Service Corporation (IPSC) submitted a Notice of Intent (NOI) to modify the Intermountain Generating Station (IGS) in Delta, Utah. Up through May 29, 2001, IPSC submitted other information for the NOI, including a Best Available Control Technology (BACT) analysis. Pursuant to a request from the Division of Air Quality, we are herewith submitting information that corrects inaccuracies found in those documents.

Corrections to the Notice of Intent, dated April 4, 2001:

Page 1, 2nd paragraph under Section (1) PROCESS DESCRIPTION: This paragraph discusses boiler capacity in the last sentence. This should state that 'normal' boiler 'operating' capacity is about 6.2 million lbs steam per hour at 2822 psi drum pressure. The current boiler maximum capacity rating (MCR) is 6.6 million lbs steam per hour at 2975 psi.

<u>Page 2, last paragraph under Section (3) POLLUTION DEVICE</u> DESCRIPTION:

This paragraph discusses proposed changes to NOx control technology in the last sentence. The term "moderately" should be removed, and the words "addition of best available control technology" should replace "replacement of the existing dual register low NOx burners with new technology staged combustion low NOx burners." The last sentence would then read "Also, the project includes installation of improved NOx controls, such as the addition of best available control technology."

Page 5, second bullet, "NOx Reduction Project":
The term "moderate" should be replaced with "BACT" in the first and last sentences.

ATTACHMENT 1, Worksheet A:

A new worksheet is attached to correct oversights in decimal or arithmetic errors, specific to lead and beryllium.

ATTACHMENT 1, Worksheet B:

A new worksheet is attached to correct oversights in decimal or arithmetic errors, specific to lead and beryllium.

ATTACHMENT 1, Worksheet C:

This worksheet addresses hazardous air pollutants as required at R307-410-4. There are several chemicals for which screen modeling may be required. A new worksheet is attached with modeling results using SCREEN3.

Corrections to BACT Analysis, dated May 29, 2001:

Page 2, Table 1, Typical Coal Characteristics: This table has several different types of ASTM analytical representations of coal. To clarify this, a new Table 1 is attached here.

Completion

We appreciate the efforts of your staff in working with us. In a June 1, 2001 meeting, IPSC & DAQ discusses a probable time line to bring an approval order to fruition. We therefore assume that our NOI and application is considered complete. However, IPSC will continue to provide clarifying information as requested to ensure the approval process proceeds smoothly. If, for some reason your office foresees any problem that could delay the issuance of an approval order, please contact us as soon as possible.

If your or any one of you staff have any questions, please contact Mr. Dennis Killian, Superintendent of Technical Services, and 435-864-4414, or <u>dennis-k@ipsc.com</u>.

Cordially,

S. Gale Chapman
President and Chief Operating Officer

RJC/BP/db

Enclosures

cc: Blaine Ipson, IPSC Reed Searle, IPA Mike Nosanov, LADWP